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Attorneys for American National Red Cross

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

_____	:	
In re:	:	Chapter 11
	:	Case No. 07-15195(MS)
BAYONNE MEDICAL CENTER,	:	
	:	Hearing Date:
Debtor.	:	
_____	:	Oral Argument Requested
	:	

**APPLICATION FOR ORDER SHORTENING TIME PERIOD FOR
NOTICE UNDER FED.R.BANKR.P. 9006(C)(1)**

The American National Red Cross (the "Red Cross"), by and through its undersigned counsel, hereby requests (the "Application") an order setting an expedited hearing and shortening time for parties-in-interest to object or otherwise respond to the Motion of American National Red Cross For An Order Authorizing and Directing Debtor To Assume An Executory Contract, Or In The Alternative, For Relief From The Automatic Stay (the "Motion"). Specifically, the Red Cross requests that the Court allow shortened time so that it may consider the Motion at the omnibus hearing scheduled for May 15, 2007, or on a date set by the Court no later than May 30, 2007. In support of the Application, the Red Cross respectfully states:

1. The Red Cross is a party to an Agreement Between Bayonne Medical Center and American Red Cross Biomedical Services, Penn-Jersey Region for the sale of blood and related services (the "Agreement").

2. The term of the Agreement began on January 1, 2005 and was automatically renewed on June 30, 2005 and June 30, 2006 for successive one year periods pursuant to Section 8.0 of the Agreement. The Agreement is scheduled to automatically renew for a one year period on June 30, 2007, unless either party provides written notice of termination at least thirty (30) days before June 30, 2007, thereby notifying the other party of its choice not to renew (herein a "Notice of Non-Renewal"). A Notice of Non-Renewal need not be for cause, but may be based entirely on a lack of desire to continue the Agreement.

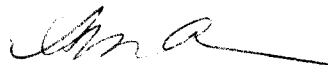
3. Debtor currently owes Red Cross \$274,729.27 for blood products delivered to Debtor prior to April 16, 2007.

4. As set forth in detail in the Motion, unless Debtor assumes the Agreement, and provides adequate assurance of payment, Red Cross will have no choice but to send its Notice of Non-Renewal on or before May 31, 2007.

5. Accordingly, the Red Cross respectfully requests that a hearing on the Motion be scheduled for the next omnibus hearing date, May 15, 2007, or a date set by the Court on or before May 30, 2007, and that objections to the motion be presented at or before the time of the hearing.

6. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006(c)(2) and the rules listed therein.

WHEREFORE, the Red Cross respectfully requests entry of the order submitted herewith.



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Dated: May 3, 2007